

KASRA SADR. (CA SBN 183765)
k.sadr@carlawfirm.com
SADR LAW FIRM, a PLC
1455 FRAZEE ROAD, SUITE 500
SAN DIEGO, CA 92108
TEL: (877)577-7237
ATTORNEY FOR PLAINTIFF, DARIUSH ZANDI

MICHAEL V. CRISTALLI, ESQ.
Nevada Bar No. 6266 (*Pro Hac Vice*)
WILLIAM D. SCHULLER, ESQ.
Nevada Bar No. 11271 (*Pro Hac Vice*)
TIFFANY B. HUNTER, ESQ. (CA SBN 306382)
CLARK HILL LLP
555 S. Flower St., Ste. 2400
Los Angeles, CA 90071-2305
Telephone: (213) 417-5313
Email : thunter@clarkhill.com

Attorneys for Defendant,
ELITE CUSTOMS & COLLISION LLC and
EAC COLLISION CENTER INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

* * *

DARIUSH ZANDI, an individual,

Plaintiff,

vs.

NICHOLAS TYLER JACKSON, an
individual; POINT 39, a Nevada Corporation;
JAMES MURRAY, an individual; ELITE
CUSTOMS & COLLISIONS, LLC, a Nevada
Limited Liability Company; EAC
COLLISION CENTER, INC., a Nevada
Corporation; and DOES 1-50, inclusive,

Defendants.

CASE NO. 3:25-cv-02737-LJC

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

Complaint Filed: March 21, 2025
Trial Date: October 13, 2026

Plaintiff DARIUSH ZANDI (“Zandi”) and Defendants ELITE CUSTOMS & COLLISION
LLC (incorrectly named as ELITE CUSTOMS & COLLISIONS, LLC) and EAC COLLISION

CENTER INC (incorrectly named as EAC COLLISION CENTER, INC.) (collectively, “Bodyshop Defendants” and with Zandi, “Parties”), by and through their respective counsel of record, hereby stipulate and agree, pursuant to FRCP 41(a):

1. That on August 25, 2025, the Court issued a Case Management Schedule [ECF No. 37], with a trial date of October 13, 2026;

2. That Zandi’s claims against Bodyshop Defendants are dismissed with prejudice; and,


3. That the Parties are to bear their respective attorney’s fees and costs.

4. Plaintiff’s Counsel hereby attests that pursuant to N.Dist. Local Rule 5-1(i)(3) that they retain evidence that each of the other signatories have concurred in the filing of this document.

Respectfully submitted this 11th day of September 2025.

THE SADR LAW FIRM, APLC

CLARK HILL LLP


KASRA SADR, ESQ.
CA State Bar No. 183765
1455 Frazee Rd., Suite 500
San Diego, CA 92108

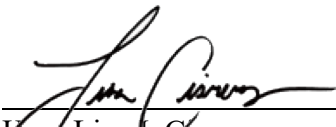
Attorneys for Plaintiff Dariush Zandi

/s/MICHAEL V. CRISTALLI, ESQ.
Nevada Bar No. 6266 (*Pro Hac Vice*)
/s/WILLIAM D. SCHULLER, ESQ.
Nevada Bar No. 11271 (*Pro Hac Vice*)
/s/ TIFFANY B. HUNTER, ESQ.
CA State Bar No. 306382
555 S. Flower St., Ste. 2400
Los Angeles, CA 90071-2305

Attorneys for Defendants Elite Customs & Collision LLC and EAC Collision Center Inc

PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: September 12, 2025



Hon. Lisa J. Cisneros
United States Magistrate Judge